

ORIGINAL

GREENBERG TRAURIG, LLP  
James W. Perkins (JWP-6684)  
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New York, New York 10166  
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Fax: (212) 801-6400  
[perkinsj@gtlaw.com](mailto:perkinsj@gtlaw.com)

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

COMPANÍA DEL BAJO CARONI (CAROMIN), C.A.,  
Calle Cuenca, Manzana 7, Campo B de Ferrominera  
Quinta Analú, Puerto Ordaz, Estado Bolívar Venezuela,  
and

V.M.C. MINING COMPANY, C.A.,  
Calle Cuenca, Manzana 7, Campo B de Ferrominera  
Quinta Analú, Puerto Ordaz, Estado Bolívar Venezuela,

Plaintiffs,

- against -

BOLIVARIAN REPUBLIC OF VENEZUELA,  
c/o Consulate General of Venezuela  
7 East 51<sup>st</sup> Street  
New York, New York 10022, and

MINISTRY OF BASIC INDUSTRIES AND MINES  
c/o Consulate General of Venezuela  
7 East 51<sup>st</sup> Street  
New York, New York 10022,

Defendants.

Civil Action No. 07 CV 3179 (NRB)

**MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, James W. Perkins, Esq., a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

RONALD W. KLEINMAN, ESQ.  
Greenberg Traurig, LLP  
800 Connecticut Avenue, N.W., Suite 500  
Washington, D.C. 20006  
Tel: (202) 331-3100  
Fax: (202) 331-3101

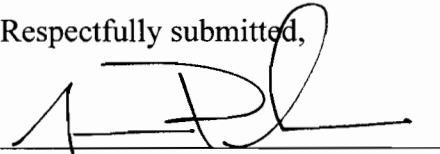
STEVEN M. SCHNEEBAUM, ESQ.  
Greenberg Traurig, LLP  
800 Connecticut Avenue, N.W., Suite 500  
Washington, D.C. 20006  
Tel: (202) 331-3100  
Fax: (202) 331-3101

RONALD W. KLEINMAN, ESQ. AND STEVEN M. SCHNEEBAUM, ESQ. are members in good standing of the Bar of the State of Washington, D.C.

There are no pending disciplinary proceedings against RONALD W. KLEINMAN, ESQ. or STEVEN M. SCHNEEBAUM, ESQ. in any State or Federal court.

Dated: August 1, 2007  
New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'JWP', is written over a horizontal line.

James W. Perkins  
SDNY Bar (JWP-6684)  
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*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

COMPANÍA DEL BAJO CARONI (CAROMIN), C.A.,  
Calle Cuenca, Manzana 7, Campo B de Ferrominera  
Quinta Analú, Puerto Ordaz, Estado Bolívar Venezuela,  
and

V.M.C. MINING COMPANY, C.A.,  
Calle Cuenca, Manzana 7, Campo B de Ferrominera  
Quinta Analú, Puerto Ordaz, Estado Bolívar Venezuela,

Plaintiffs,

- against -

BOLIVARIAN REPUBLIC OF VENEZUELA,  
c/o Consulate General of Venezuela  
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New York, New York 10022, and

MINISTRY OF BASIC INDUSTRIES AND MINES  
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7 East 51<sup>st</sup> Street  
New York, New York 10022,

Defendants.

Civil Action No. 07 CV 3179 (NRB)

**AFFIDAVIT OF  
JAMES W. PERKINS, ESQ.,  
IN SUPPORT OF MOTION TO  
ADMIT COUNSEL OF PRO HAC VICE**

STATE OF NEW YORK     )  
                                  ) ss:  
COUNTY OF NEW YORK )

JAMES W. PERKINS, being duly sworn, deposes and says:

1. I am a Shareholder with the firm Greenberg Traurig, LLP, attorneys for Compañia Del Bajo Caroni (Caromin), C.A, and V.M.C. Mining Company, C.A. the Plaintiffs in this action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Ronald W. Kleinman, Esq., and Steven M. Schneebaum, Esq. as counsel *pro hac vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on March 22, 1988. I am so admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Ronald W. Kleinman, Esq. since 1987.

4. I have known Steven M. Schneebaum, Esq. since 2006.

5. Mr. Kleinman is a Shareholder at Greenberg Traurig, LLP in Washington, D.C. and a member of the bar of the District of Columbia in good standing. I attach hereto as Exhibit A, a Certificate of Good Standing for Mr. Kleinman.

6. Mr. Schneebaum is a Shareholder at Greenberg Traurig, LLP in Washington, D.C. and a member of the bar of the District of Columbia in good standing. I attach hereto as Exhibit B, a Certificate of Good Standing for Mr. Schneebaum.

7. I have found both Mr. Kleinman and Mr. Schneebaum to be skilled attorneys and persons of integrity. Both are experienced in Federal practice and are familiar with the Federal Rules of Procedure.

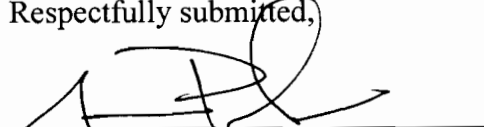
8. Accordingly, I am pleased to move the admissions of Ronald W. Kleinman, Esq. and Steven M. Schneebaum, Esq., *pro hac vice*.

9. I respectfully submit a proposed order granting the admission of both Ronald W. Kleinman, Esq., and Steven M. Schneebaum, Esq., *pro hac vice*, which is attached hereto as Exhibit C.

WHEREFORE, it is respectfully requested that the motion to admit Ronald W. Kleinman, Esq. and Steven M. Schneebaum, Esq. *pro hac vice*, to represent Plaintiffs in the above captioned action, be granted.

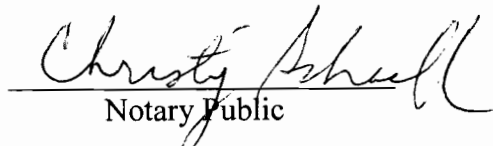
Dated: August 1, 2007  
New York, New York

Respectfully submitted,



James W. Perkins  
SDNY Bar Code: (JWP-6684)

Sworn to before me this  
1<sup>st</sup> day of August, 2007

  
Notary Public

CHRISTY SCHAEFFER  
Notary Public, State of New York  
No. 31-4769958  
Qualified in New York County  
Commission Expires August 31, 2010



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

RONALD WAYNE KLEINMAN

\_\_\_\_\_

was on the 4<sup>TH</sup> day of APRIL, 1978

\_\_\_\_\_

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 26, 2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

STEVEN MARC SCHNEEBAUM

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was on the 31<sup>ST</sup> day of MARCH, 1978  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on July  
26, 2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk

**AFFIDAVIT OF SERVICE BY REGULAR MAIL**

STATE OF NEW YORK )

) ss.:

COUNTY OF NEW YORK )

Civil Action No. 07 CV 3179 (NRB)

NATALIE ALCEE-SEEPERSAD, being duly sworn, deposes and says:

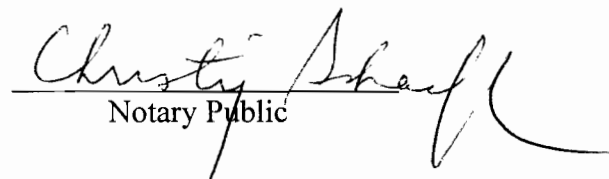
I am not a party to this action, I am over 18 years of age and reside in Queens, New York.

On August 1, 2007, I served the within MOTION TO ADMIT COUNSEL *PRO HAC VICE*, AFFIDAVIT OF JAMES W. PERKINS, ESQ., IN SUPPORT OF MOTION TO ADMIT COUNSEL OF *PRO HAC VICE* with the attached Exhibits A through C by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the United States Postal Service within New York State, addressed to:

Kenneth S. Leonetti, Esq.  
FOLEY HOAG, LLP  
1875 K Street, N.W.  
Washington, D.C. 20006

  
NATALIE ALCEE-SEEPERSAD

Sworn to before me this  
1<sup>st</sup> day of August, 2007

  
Notary Public

CHRISTY SCHAEFFER  
Notary Public, State of New York  
No. 31-4769958  
Qualified in New York County  
Commission Expires August 31, 2010